

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
GREENVILLE DIVISION

IN RE:)	
)	
CAH ACQUISITION)	CASE NO.: 19-01298-5-JNC
COMPANY 7, LLC)	Chapter 11
)	
Debtor)	
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IN RE:)	
)	
CAH ACQUISITION)	CASE NO.: 19-01697-5-JNC
COMPANY 12, LLC)	Chapter 11
)	
Debtor)	
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IN RE:)	
)	
CAH ACQUISITION)	CASE NO.: 19-01227-5-JNC
COMPANY 16, LLC)	Chapter 11
)	
Debtor)	
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**OBJECTION OF COHESIVE HEALTHCARE MANAGEMENT &
CONSULTING LLC TO THE THIRD APPLICATIONS BY GRANT
THORNTON LLP AS FINANCIAL CONSULTANT FOR THE TRUSTEE FOR
ALLOWANCE OF INTERIM COMPENSATION AND REIMBURSEMENT OF
EXPENSES [AUGUST 1, 2019 THROUGH NOVEMBER 30, 2019]**

Cohesive Healthcare Management and Consulting, LLC ("Cohesive"), objects to the Third Applications by Grant Thornton LLP as Financial Consultant for the Trustee for Allowance of Interim Compensation and Reimbursement of Expenses ("Grant Thornton") for services rendered from August 1, 2019 through November 30, 2019 filed on April 10, 2020¹, filed by Richard R. Vanderbeek, in these cases (collectively, the "Applications"). In support of this Objection, Cohesive states:

¹ DKT 528 in Case No. 19-01298, DKT 505 in Case No. 19-01697, and DKT 475 in Case No. 19-01227.

BACKGROUND

1. CAH Acquisition Company 7, LLC dba Prague Community Hospital ("Prague") filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code on March 17, 2019. Thomas Waldrep, as Trustee was appointed by order on March 21, 2019.

2. CAH Acquisition Company 16, LLC dba Haskell Community Hospital ("Haskell") filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code on March 17, 2019. Thomas Waldrep, as Trustee was appointed by order on March 18, 2019.

3. CAH Acquisition Company 12, LLC dba Fairfax Community Hospital ("Fairfax") filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code on April 1, 2019. Thomas Waldrep, as Trustee was appointed by order on April 12, 2019.

4. The Applications filed on April 10, 2020 seek approval of the aggregate sum of \$254,259.38² for fees and \$26.32 for reimbursement of expenses for the period of August 1, 2019 through November 30, 2019. Cohesive has reviewed and objects to the Applications as filed. Cohesive does not object to the sufficiency of the Applications or the amount sought by Grant Thornton.

5. Cohesive is owed more than \$12.5 million in these cases for its court-approved work running the Debtor's hospitals and is also entitled to be paid.

6. Grant Thornton should not be permitted to be paid at the expense of Cohesive in these cases.

7. Cohesive does not object to the aggregate amount of fees and expenses or the right of the professionals to be paid if there are sufficient funds to pay all administrative claims.

² Fees of \$91,001.69 and reimbursement of expenses of \$13.16 in Case No. 19-01298, Fees of \$88,434.00 and reimbursement of expenses of \$0.00 in Case No. 19-01697, and Fees of \$74,823.69 and reimbursement of expenses of \$13.16 in Case No. 19-01227.

8. Cohesive's Objection seeks to reserve its rights to request the reduction and/or disgorgement of Grant Thornton's professional fees and requests a hearing on the matter.

9. Cohesive reserves the right to amend and/or supplement this Objection and raise and assert additional objections at the hearing on this matter.

WHEREFORE, Cohesive respectfully prays unto the Court as follows:

1. That the Third Applications by Grant Thornton LLP as Financial Consultant for the Trustee for Allowance of Interim Compensation and Reimbursement of Expenses for services rendered from August 1, 2019 through November 30, 2019 be denied unless or until Cohesive's Objections are satisfied;

2. That a hearing be set on the Applications and this Objection, if not first resolved; and

3. For such other and further relief as to the Court may seem just and proper.

This the 22nd day of April, 2020.

/s/Paul A. Fanning

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CERTIFICATE OF SERVICE

I certify that the foregoing OBJECTION OF COHESIVE HEALTHCARE MANAGEMENT & CONSULTING LLC TO THE THIRD APPLICATION BY GRANT THORNTON LLP AS FINANCIAL CONSULTANT FOR THE TRUSTEE FOR ALLOWANCE OF INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES [AUGUST 1, 2019 THROUGH NOVEMBER 30, 2019] was filed electronically in accordance with the local rules and was served electronically on those entities that have properly registered for such electronic service. Entities not registered for electronic service will be served by depositing a copy thereof in the United States mail, postage pre-paid.

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Bankruptcy Administrator

This the 22nd day of April, 2020.

/s/Paul A. Fanning

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